

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

**RE: DAN M. JONES, JR. and  
TONYA C. JONES, Debtors**

**CASE NO: 14-50381-KMS  
CHAPTER 13 PROCEEDING**

**OBJECTION TO CLAIM NO. 10**

Comes now, Dan M. Jones, Jr., and Tonya C. Jones (“Debtors”), by and through their attorney, Jason Graeber, and files this, their Objection to Claim No. 10 filed by Ocwen Loan Servicing, LLC (“Ocwen”), on June 4, 2014, in the amount of \$21,562.26 pursuant to Rule 3007, and in support of same should show unto the Court the following, to wit:

1. This case was commenced by the filing of a Chapter 13 petition with the Bankruptcy Court on March 7, 2014.
2. This Court has jurisdiction over the parties and subject matter pursuant to 11 USC § 1334 and this matter is a core proceeding pursuant to 11 USC 157.
3. Ocwen’s proof of claim states the Debtors missed approximately 19 payments and the Debtors failed to maintain insurance on their home.
4. However, the Debtors have proof of several payments Ocwen claims were missed.
5. The Debtors also have proof of insurance for the periods in question.
6. The Debtors’ chapter 13 plan list the approximate amount owed to Ocwen as \$9,555.00.
7. The Debtors disputes the amount listed on Claim No. 10 of \$21,562.26 and requests a hearing to resolve this matter and to set the amount owed to Ocwen.

WHEREFORE, PREMISES CONSIDERED, the Debtors pray that this Objection be received and filed, and that upon consideration by the Court, if no Response is timely filed, or upon hearing in the event of a timely Response, the Court will enter its Order Confirming the Chapter 13 Plan, and setting set the amount to owed to Ocwen.

This the 24<sup>th</sup> day of June 2014.

DAN M. JONES & TONYA C. JONES, Debtors, by  
/s/Jason Graeber  
Jason Graeber MS Bar 101267  
2462 Pass Rd.  
Biloxi, MS 39531  
(228)207-7117  
(228)207-8634 fax

**CERTIFICATE OF SERVICE**

I, Jason Graeber, Counsel for the above-listed Debtor(s), do hereby certify that I have served, this day, electronically, by the *Notice of Electronic Filing*, or by First-Class U.S. Mail, postage prepaid, a true and correct copy of the above and foregoing *Objection to Claim No.10*. on this the 24<sup>th</sup> day of June, 2014, to:

Warren A. Cuntz, Jr., Esq.  
Chapter 13 Trustee  
POB 3749  
Gulfport, MS 39505  
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Ocwen  
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Carol Stream, IL 60197

Henry G. Hobbs, Jr., Esq.  
United States Trustee  
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Ocwen Loan Servicing  
Attn: Bankruptcy Dept.  
POB 24605  
West Palm Beach, FL 33416

/s/Jason Graeber  
Jason Graeber MS Bar 101267